

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

REVIEW OF FEDERAL COMMUNICATIONS)
COMMISSION'S TRIENNIAL REVIEW ORDER) CASE NO.
REGARDING LOCAL CIRCUIT SWITCHING) 2003-00347
FOR DS1 ENTERPRISE CUSTOMERS)

KENTUCKY ALLTEL INC.'S
RESPONSE TO DATA REQUEST OF COMMISSION STAFF
TO INCUMBENT LOCAL EXCHANGE CARRIERS

Kentucky ALLTEL, Inc., ("Kentucky ALLTEL") provides the following responses to the KYPSC Staff's data requests.

DATA REQUESTS

1. BellSouth Telecommunications, Inc., ALLTEL of Kentucky, and Cincinnati Bell Telephone Company shall supply the following information for each wirecenter in their respective Kentucky service territories. The information requested shall be provided in a tabular format and contain, at a minimum, the following elements: (1) wirecenter CLLI code, (2) wirecenter/location name, and (3) exchange name.

a. The total number of high-capacity (DS1 or greater) circuits that are

(i) provided at retail to end-users; and

KENTUCKY ALLTEL RESPONSE: See Exhibit A.

(ii) supplied on a wholesale basis to CLECs for resale.

KENTUCKY ALLTEL RESPONSE: See Exhibit A.

b. The total number of high-capacity (DS1 or greater) unbundled network elements loops (UNE-L) leased by all CLECs.

KENTUCKY ALLTEL RESPONSE: See Exhibit B.

c. The total number of high-capacity (DS1 or greater) UNE-L

combined with UNE switching (UNE-P) leased by all CLECs.

KENTUCKY ALLTEL RESPONSE: Kentucky ALLTEL, Inc is leasing no high capacity UNE-L combined with UNE switching to CLECs.

2. Every CLEC party that owns or controls local switching facilities used to provide high-capacity (DS1 or greater) circuits in Kentucky shall report, for each wirecenter in its Kentucky service territory, the total number of high-capacity (DS1 or greater) circuits that are (1) provided at retail to end-users or (2) supplied on a wholesale basis to other CLECs. The information requested shall be provided in a tabular format and contain, at a minimum, the following elements: (1) wire center CLLI code, (2) wirecenter/location name, and (3) exchange name.

KENTUCKY ALLTEL RESPONSE: ALLTEL does not have a CLEC operating within the Commonwealth. However, ALLTEL is aware of many CLECs that are providing service to enterprise market customers in ALLTEL territory.

3. The ILEC parties and CLEC parties shall provide the following:

a. The aggregated annual (including annualized revenues for new customer accounts of less than one year) revenues generated from all customer accounts by wirecenter in the service area must be identified for those customers utilizing high-capacity switch (DS1 and higher) services. In calculating revenues, if there are revenues flowing to affiliated companies for other services such as wireless, data, or Internet provision, identify and include these revenues in the aggregate revenue calculation for 2001, 2002 and year-to-date 2003.

KENTUCKY ALLTEL RESPONSE: See Exhibit C.

b. The annual revenue generated by the smallest (in terms of revenue and in number of lines) DS1 service customer account in each wire center in 2002 and year-to-date 2003.

KENTUCKY ALLTEL RESPONSE: The information Staff requests is not attainable by electronic or otherwise automated means. The manual effort that would be required to sort and assimilate this data is so overly burdensome and time consuming as to render the information unattainable.

c. The number of DS1 service customer accounts and the aggregate revenue in each wirecenter which has been lost to competitors in 2001, 2002 and year-to-date 2003.

KENTUCKY ALLTEL RESPONSE: The information Staff requests is not attainable by electronic or otherwise automated means. The manual effort that would be required to sort and assimilate this data is so overly burdensome and time consuming as to render the information unattainable. However, there have been 282 Enterprise customers, comprising 2,386 lines, that have left the

ALLTEL network and subscribed to CLEC service. Additionally, there are additional other customers in ALLTEL service territory that have never subscribed to ALLTEL service, but rather subscribed to CLEC service initially.

d. The identity of known companies competing for DS1 service customers in each wirecenter for 2001, 2002 and year-to-date 2003.

KENTUCKY ALLTEL RESPONSE: Kentucky ALLTEL did not operate in the Commonwealth during 2001 nor in the first half of 2002. Kentucky ALLTEL does not maintain a running record of competing carriers. It can only provide current competing carriers. See Exhibit B for the list of known companies competing with Kentucky ALLTEL for DS1 service as of October, 2003. This list is incomplete as there are apparently other CLECs competing for DS1 service with respect to which Kentucky ALLTEL does not have line or customer information because these CLECs do not collocate or interconnect directly with Kentucky ALLTEL.

e. The guidelines used by sales representatives servicing DS1 customer accounts to identify and acquire new customer accounts.

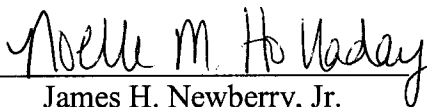
KENTUCKY ALLTEL RESPONSE: The sales staff do not have a formal set of guidelines used to identify and acquire new customer accounts.

f. The threshold criteria that define and characterize a customer who would benefit from either initially subscribing to DS1 services (new/start-up) or upgrading existing services to DS1 services.

KENTUCKY ALLTEL RESPONSE: All DS1 sales are dependent upon the specific customer's requirements/applications. This primarily includes the necessary bandwidth required for voice, data, video or internet applications.

Respectfully submitted,

Kentucky ALLTEL, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the following via electronic service or by regular U.S. mail postage prepaid this 21st day of November, 2003:

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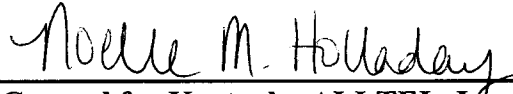

Counsel for Kentucky ALLTEL, Inc.

Exhibit “A”
Response to Data Request 1.a.(i), (ii).

Exhibit A

EXCHANGE	RETAIL	WHOLESALE	TOTAL
			44
			4
			220
			685
			14
			84
			34
			4
			240
			2
			1
			11
			13
			19
			8
			4
			20
			5
			44
			91
			359
			11
			1
			57
			62
			30
			4
			65
			5
			1
			2
			7
			15
			1
			17
			13
			1113
			8
			21
			3
			2
			1
			2
			18
			8
			99
			4

Exhibit A

				TOTAL
				9
				2
				246
				17
				60
				93
				52
				52
				312
				2
				42
				46
				74
				10
				11
				35
				3
				112
				93
				1
				2181
				299
				204
				207
				4463
				222
				413
				274
				88
				115
				7
				1112
				3
				1
				5
				54
				1
				37
				148
				11
				4
				98
				465
				10
				4
				31
				4
				400
				2
				8

Exhibit A

			TOTAL
			15
			2
			51
			1
			6
			20
			1
			2
			24
			99
			8
			1
			6
			52
			2
			9
			32
			28
			574
			10
			3
			22
			16
			10
			6
			10
			22
			32
			4
			3
			114
			234
			10
			87
			8
			1
			39
			5
TOTAL	7901	9287	17188

Exhibit "B"
Response to Data Request 1.b.

Exhibit B

CENTRAL OFFICE	CLLI	Exchange	CLEC	DS3	DS1
				0	0
				0	0
				0	0
				0	0
				3	12
				3	12
				3	12
				0	0
				3	12
				0	0
				0	0
				8	84
				3	12
				11	96
				3	12
				3	12
				36	0
				24	84
				3	12
				24	28
				4	168
				9	252
				100	544
				3	12
				4	168
				7	180
				8	84
				3	12
				4	168
				15	264
				3	12
				3	12
				0	0
				0	0
				0	0
				0	0
				3	12
				3	12
				0	0
				0	0
Grand Total				148	1144

Exhibit "C"
Response to Data Request 3.a.

Exhibit C

Kentucky ALLTEL, Inc.

[illegible]

Kentucky ALLTEL, Inc.[illegible]

Kentucky ALLTEL, Inc.[illegible]